

Karen Ashikeh LaMantia  
341 Bonito  
Long Beach, CA 90802

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Ms. Angela Reynolds , Environment Officer  
Department of Planning and Building: Sports Park DEIR  
City Of Long Beach  
333 West Ocean Blvd.  
Long Beach, CA 90802

#### Concerns - WATER POLLUTION and FLOOD CONTROL

The studies of the soils at this site show significant soil contamination. It is doubtful that water, passing through these layers of contaminated soil at this site should ever be allowed to enter the water table below. No mention is made of the effects on our deep water resources if continuous, regular watering occurs on playing fields at this site. Since the makeup of much of what is underground here is unknown, the chance that significant water pollution could take place should be considered.

#### QUESTION:

What would the short and long term effects on water quality be from increased, regular watering of fields at this site?

1

Chemicals and fertilizers used to create playing fields, in combination with dangerous toxins known to be or thought to be underground at this site, make the addition or any new chemicals both unsafe and unwise. No mention has been made of organic options for creating playing fields or buildings.

#### QUESTION:

What are the dangers of interactions of below ground chemicals with above ground fertilizers, applied to playing fields?

In case of serious drought, these fields would be a last priority for our community water supplies.

#### QUESTION:

Since the Sports Park is operated by a private company, and not the City of Long Beach, would this leave the City open to lawsuits if water supplies to this project need to be used for the human population, industry or to provide water for environment programs mandated by the EPA , Regional Water Boards or other State agencies?

2

#### FLOOD CONTROL

This area was and is a significant watershed resource for this area and serves functions for flood control. The area considered wetlands is grossly underestimated in this report as the watershed area, considered the 100 years high water mark for flood control purposes, is not included. It is important that an accurate picture of the roll played by this landscape in flood control, with its current landscape features, be made.

3

(cont.)

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## Water Pollution – Flood Control (cont)

This study should require measurements of the impacts of large amounts of rainfall, such as what fell in Jan 2005, on this site and surrounding areas.

## QUESTIONS :

Will proposed playing fields will be affected for a significant portion of the year by any rainfall?

How will this effect the profitability of this locations as a sports park?

What realistic, alternative flood control measures are assured for surrounding homes, oil wells, businesses and at the nearby cemetery and on this site, if land configuration is changed so drastically for this project?

Thank you for your consideration of my concerns,

Karen Ashueh-halmantra

2/7/05

## KAREN ASHIKEH LAMANTIA/FIFTH LETTER

### P-8-1

Section 4.13 of the Draft EIR explains the results of extensive soil sampling and analysis, which indicates that the project site is impacted by crude oil as a result of oil extraction; however, crude oil is not a toxic contaminant. Isolated areas of arsenic, which may be naturally occurring, were also identified and can be addressed through a grading and soil management program to ensure that there is no exposure to, and therefore no health risk presented by, the constituent. As discussed on page 4.13-29 of the Draft EIR, former uses on portions of the site may have involved hazardous materials that possibly resulted in soil contamination, although this is considered unlikely based on extensive soil sampling already conducted at the site. It is conceivable that if contamination is subsequently found on portions of the site, it may require remediation and control to prevent potential short-term health risks to construction workers and the adjacent community. Mitigation measures are provided to require the remediation of previously undiscovered contaminated soils (Mitigation Measures 4.13.4, 4.13.6, and 4.13.8), should such a situation arise. In addition, as discussed on page 4.4-6 of the Draft EIR, there are no groundwater production wells in the vicinity of the project site. Oil resources and active oil drilling operations preclude use of the site for groundwater recharge. That is, groundwater at the site is not used for municipal purposes. BMPs required to prevent adverse impacts to surface waters will serve the same purpose for groundwater.

As listed in Mitigation Measure 4.4.3, a project-level SUSMP will be required. The SUSMP must include BMPs that control pollutants of concern at the source (e.g., pesticides and fertilizers) as well as BMPs that treat surface water runoff. In addition, the Long Beach Storm Water Management Program Manual, which was developed to implement the requirements of the municipal NPDES permit, requires the use of a hierarchy of controls for minimizing the use of pesticides and fertilizers with a preference for mechanical controls (e.g., mowing) and biological controls (e.g., beneficial insects, pheromones) before chemical controls (e.g., pesticides, herbicides). SD-21, Alternative Building Materials (Table 4.4-D of the Draft EIR), will be incorporated into the project design. Alternative building materials reduce the potential sources of pollutants in surface water runoff by eliminating compounds that can leach into runoff, reducing the need for pesticide application, for painting and other maintenance, or by reducing the volume of runoff.

### P-8-2

This comment questions whether the City will be open to lawsuits if water supplies for the Proposed Project were needed for the human population or industry or to provide water for environmental programs. As stated in the Draft EIR, all new development, including the Proposed Project, is required to comply with State laws regarding water conservation measures, including pertinent provisions of Title 20 and Title 24 of the California Government Code regarding the use of water-efficient appliances. Sufficient water supplies are available to serve the Proposed Project, and the Long Beach Water Department will be able to accommodate the increased demand for potable and reclaimed water.

**P-8-3**

The site ultimately drains to the Los Angeles River and is therefore within the Los Angeles River Watershed (tributary to the Los Angeles River). Wetlands are a specific type of “waters” (refer to Section 4.5 of the Draft EIR). As stated on page 4.4-16 of the Draft EIR, the project site is not mapped within a 100-year flood hazard area. As stated on page 4.4-1 of the Draft EIR, there is an existing detention basin at the site to prevent flooding of downstream properties during large storms. In its hydrology report for the project (Appendix C of the Draft EIR), PBS&J analyzed the 50-year storm event consistent with City and County requirements and incorporated the required detention volume to prevent downstream flooding into its calculations. Mitigation Measure 4.4.5 requires preparation of a final hydrology study based on the final design of the project. This study will be reviewed and approved by the Director of Public Works in order to protect downstream properties from flooding conditions consistent with regulatory requirements; therefore, alternative flood control measures are not necessary.

As stated on page 4.4-15 of the Draft EIR, the soccer fields will have a 72-hour detention time. Therefore, after major storms, water will remain up to 72 hours in the soccer fields as they slowly drain to the storm drain system. The question regarding profitability is not applicable to review under CEQA.